# **EXHIBIT G**

SOUTHERN DISTRICT OF NEW YORK		
	X	
IN RE COLUMBIA UNIVERSITY TUITION	•	Lead Case No. 1:20-cv-03208 (JMF)
REFUND ACTION		Lead Case 140. 1.20-ev-05200 (31411)
	4	
	X	

#### **DECLARATION OF MARY BUTLER**

- I, MARY BUTLER, declare the following facts to be true and correct and if called as a witness would testify competently to the same:
- 1. I am employed as a Case Manager by Simpluris, Inc. ("Simpluris"), the claims administrator in the above-entitled action. My business address is 3194-C Airport Loop Drive, Costa Mesa, CA 92626. My telephone number is (714) 640-5643. I am over 21 years of age and authorized to make this declaration on behalf of Simpluris and myself.
- 2. Simpluris is a class action Settlement Administration Company headquartered in Costa Mesa, California. It was founded by individuals who have each managed hundreds of Settlements along with professionals in the areas of software development, third-party claims administration, mail-house operations and call center support management.
- 3. Simpluris was appointed by the Court as Settlement Administrator to administer the Settlement in accordance with the terms of the Stipulation of Settlement, (the "Settlement"). Simpluris has been responsible, among other things, for: (a) mailing and emailing the Short Form Notice ("Notice"); (b) establishing a website; (c) serve as Escrow Agent for the Settlement Fund; (d) forwarding to Class Counsel, with copies to Columbia's Counsel, all documents and other materials received; (e) receiving and validating requests for exclusion; (f) providing weekly reports; (g) and answering questions from Class Members. If the Court grants final approval of

the Settlement, Simpluris will be responsible, among other things, for: (i) calculating individual Settlement payments, distributing funds, and tax-reporting following final approval; (ii) mailing Settlement checks or arranging for payment to Class Members via Venmo or Paypal if they so elected; (iii) and for such other tasks as the Parties mutually agree or the Court orders Simpluris to perform.

## TOLL FREE TELEPHONE HELPLINE

4. A toll-free telephone number was included in the Class Notice for the purpose of allowing the Settlement Class Members to call Simpluris and to make inquiries regarding the Settlement. The system is accessible 24 hours a day, 7 days a week, and will remain in operation throughout the settlement process. Callers have the option to speak with a live Call Center Representative during normal business hours or to leave a message and receive a return call during non-business hours. The toll-free telephone number included in the Class Notice was 1-877-645-1926

#### NOTIFICATION TO THE CLASS

- 5. On November 29, 2021, Simpluris received the Court-approved Long Form and Short Form Notices from Counsel. The Notice advised Settlement Class Members of their right to opt out from the Settlement, object to the Settlement, or do nothing, and the implications of each such action. The Notice advised Settlement Class Members of applicable deadlines and other events, including the Final Approval Hearing, and how Settlement Class Members could obtain additional information.
- 6. On December 17, 2021, Counsel for Defendant provided Simpluris with a list containing the name, email address, last known mailing address, and any secondary email address

or mailing address for the Settlement Class Members. The Class List contained data for 28,079 unique Settlement Class Members.

- 7. On January 7, 2022, the Short Form Notices were emailed to the 28.079 Class Members contained in the Class List. Since all Settlement Class Members had email addresses, no notices were sent via USPS.
- 8. After the initial notice mailing, one (1) individual contacted Simpluris to request inclusion in the Settlement Class. Information regarding the self-identifying individual was forwarded to Defense Counsel for research to determine if they should be included in the Settlement Class. It was determined that the one (1) individual should not be included because they are a Barnard College student.

## WEBSITE

9. Simpluris also established and is maintaining a website dedicated to this project (www.ColumbiaCovidRefundClassAction.com) to provide additional information to the Class Members. Class Members were able to visit the website to update their address and elect to receive the Settlement Benefit by Venmo or PayPal instead of a paper check. The Long Form Notice, Preliminary Approval Order, and Settlement Agreement (including all of its exhibits) are available for download from the website. The website was operational on January 7, 2022, and is accessible 24 hours a day, 7 days a week.

# **EXCLUSIONS AND OBJECTIONS**

- 10. As of this date, Simpluris received no requests for exclusion from the Settlement.
- 11. As of this date, Simpluris has not received any objections.

# **ADMINISTRATION COSTS**

12. Simpluris' total costs for services in connection with the administration of this Settlement, including fees incurred and anticipated future costs for completion of the administration, are \$55,000.00. Simpluris' work in connection with this matter will continue with the calculation of the Settlement checks, issuance and mailing of those Settlement checks, etc., and to perform the necessary tax reporting on such payments.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 7th day of February 2022, at Frisco, TX.

Mary Dutter